

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FARHAD AZIMA,
ALG TRANSPORTATION, INC.,
MAIN 3260 LLC,
FFV W39 LLC, and
FFV DEVELOPMENT LLC,

Plaintiffs,

v.

DECHERT LLP,
DAVID NEIL GERRARD,
DAVID GRAHAM HUGHES,
NICHOLAS DEL ROSSO,
VITAL MANAGEMENT SERVICES, INC.,
AMIT FORLIT,
INSIGHT ANALYSIS AND RESEARCH LLC,
SDC-GADOT LLC,
AMIR HANDJANI,
ANDREW FRANK, and
KARV COMMUNICATIONS,

Defendants.

Case No. 1:22-cv-08728 (PGG) (JW)

**SECOND DECLARATION OF JOHN C. QUINN IN SUPPORT
OF DEFENDANTS' JOINT REPLY MEMORANDUM OF LAW IN SUPPORT OF
DEFENDANTS' MOTIONS TO DISMISS**

I, JOHN C. QUINN, declare as follows:

1. I am an attorney with the law firm of Kaplan Hecker & Fink, counsel for Defendant Dechert LLP ("Dechert"). I submit this declaration in support of Defendants' Joint Reply Memorandum of Law in Support of Defendants' Motions to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6).

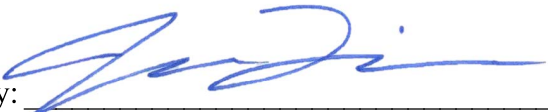
2. Attached hereto as Exhibit 1 is a true and correct copy of the May 15, 2023, decision of the English Court of Appeal, *Ras Al Khaimah Inv. Auth. v. Azima* [2023] EWCA Civ 507, a judicial record.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Application notice for default judgment in *Ras Al Khaimah Inv. Auth. v. Azima*, Case. No. HC-2016-002798, a judicial record.

4. Attached hereto as Exhibit 3 is a true and correct copy of the transcript from the October 17, 2022, hearing in *Ras Al Khaimah Inv. Auth. v. Azima*, Case. No. HC-2016-002798, a judicial record.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 20, 2023
New York, New York

By: 
John C. Quinn